

Mike Capuano

Democrat for Congress

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COMMISSION MAIL ROOM

2000 FEB 17 P 1:55

February 14, 2000

Ms. Pat Sheppard, Senior Reports Analyst
Federal Election Commission - Reports Analysis Division
999 E. Street, NW
Washington, D.C. 20463

Re: Response to Letter dated 2/1/2000 - Mid-Year Report (1/01/99-6/30/99)
FEC#C00336388.

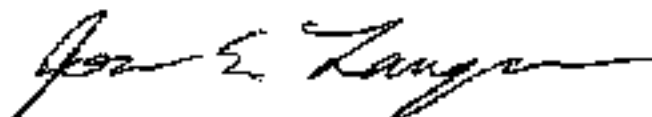
Dear Ms. Shepard:

I am writing in response to your letter dated February 1, 2000 concerning the matter of loans made by the candidate to the committee and the source of such loans during the above referenced reporting period.

Upon my review of the Commission's regulations, I have concluded that such funds qualify as "personal funds". With respect to the loan amount itemized on Schedule A, Line 13(a) for \$5,000, such amount was drawn on the home equity account of the candidate which was established in the late 1980's. The credit line on such account has not been extended since August of 1998, nor has the rate been adjusted since that time. Such account has been used for a variety of personal purposes over the years and was not initiated for purposes of funding a campaign. It is an unrestricted general use account, similar to a personal checking account, and subject primarily to the balance available. The amount tendered during this reporting period is less than 50% of the total amount available under the account. Therefore, it is my opinion that said account constitutes "personal funds" under, and other wise complies with the provisions of 11CFR §110.10.

If you have any additional questions or if there is additional information you require, please do not hesitate to contact me at the Campaign headquarters as referenced herein.

Very truly yours,
Capuano for Congress Committee



Joan E. Langsam, Treasurer